

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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AVE CINAR, CELESTE DRAYTON,  
NICOLE ADOLPHUS, DARLENE RIERA,  
and STUART BARON, individually on  
behalf of themselves and on behalf of all  
others similarly situated,

**20-cv-01362 (RPK)(JRC)**

**ORDER**

Plaintiffs,

-against-

R&G BRENNER INCOME TAX, LLC,  
SUMMIT CONSULTANTS, INC., APEX  
PLANNING INC., and BENJAMIN K.  
BRENNER,

Defendants.

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The above-captioned Parties, by and through their undersigned counsel, hereby respectfully submits this Proposed Order governing the dissemination of notice to class members for the Court's review and consideration:

1. Defendants shall produce the names, last known addresses, and last known telephone numbers for all class members within five (5) business days of the Court approving the Parties' proposed Class Notice, filed at D.E. 114.

2. All Class Notices shall be disseminated via USPS First Class Mail within ten (10) business days of the Court approving the Parties' proposed Class Notice, filed at D.E. 114.

3. For any class members whose Class Notice is returned as undeliverable, Plaintiffs' counsel will skip-trace such class member's telephone number to ascertain a current address at which to deliver the Class Notice.

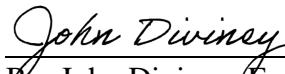
Dated: Massapequa, New York  
November 13, 2024

The NHG Law Group, P.C.

  
By: Keith E. Williams, Esq.  
*Attorneys for the Plaintiffs*

Dated: Uniondale, New York  
November 13, 2024

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By: John Diviney, Esq.  
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Dated: Brooklyn, New York  
November 22, 2024

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SO ORDERED:

s/ James R. Cho

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Hon. James R. Cho, U.S.M.J.